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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MICHAEL SHANE,  
  
Plaintiff,  
  
v.  
  
NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,  
  
Defendant.

)  
) Case No. 2:16-cv-02263-JAD-CWH  
)

) **JOINT STIPULATION FOR EXTENSION OF**  
) **TIME TO FILE DEFENDANT'S NOTICE OF**  
) **VOLUNTARY REMAND OF THE CASE OR**  
) **CROSS-MOTION TO AFFIRM**

) **(First Request)**  
)

1 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that  
2 the time for responding to Plaintiff's Motion for Summary Judgment be extended for approximately  
3 forty-six (46) days from June 5, 2017 to **July 21, 2017**. This is Defendant's first request for extension.  
4 Good cause exists to grant Defendant's request for extension. Additional time is required as counsel  
5 for Defendant has over 50+ active matters, of which two dispositive motions are required on the same  
6 date as the current deadline. Counsel for Defendant also had to take unexpected family medical leave  
7 earlier this month to care for her elderly mother who just had surgery. As a result, Counsel for  
8 Defendant needs additional time to respond to her pending matters resulting from the unanticipated  
9 family medical leave. In addition, due to the nature of this case and voluminous paper transcript,  
10 Counsel respectfully requests additional time to respond to Plaintiff's Motion for Summary Judgment  
11 in order to adequately research, analyze and respond to the issues presented by Plaintiff. Defendant  
12 makes this request in good faith with no intention to unduly delay the proceedings. Plaintiff has no  
13 objection to the requested relief.  
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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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3 Respectfully submitted,

4 Date: May 30, 2017

5 By: /s/ Marc Kalagian  
6 MARC V. KALAGIAN  
\*by email authorization on 5/30/17  
Attorney for Plaintiff

7 Date: May 30, 2017

8 STEVEN W. MYHRE  
Acting United States Attorney

9  
10 By: /s/ Tina L. Naicker  
11 TINA L. NAICKER  
Special Assistant United States Attorney

12  
13 **IT IS SO ORDERED.**

14  
15  
16 DATE: June 1, 2017

17   
18 THE HONORABLE CARL W. HOFFMAN  
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
3 **JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF**  
4 **VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM**

5 on the date and via the method of service identified below:

6 **CM/ECF:**

7  
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21 Attorneys for Plaintiff  
22 MICHAEL SHANE

23  
24 Respectfully submitted this 30th day of May 2017,

25 /s/ Tina L. Naicker  
26 TINA L. NAICKER  
Special Assistant United States Attorney